IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA, Plaintiff, v. LI SHAOMING, MO HAILONG, also known as Robert Mo, WANG LEI, WANG HONGWEI, YE JIAN, LIN YONG, and MO YUN Defendants.	Case No. 4:13-CR-147 UNRESISTED MOTION TO EXTEND DEADLINE

The Defendant, Mo Hailong, moves this Court for an order extending the February 10, 2015 deadline to enter a status report. Mr. Mo states the following in support of his Unresisted Motion to Extend Deadline:

1. This Court's Order dated January 27, 2015 set a deadline of February 10, 2015 for the parties to enter a joint status report regarding any additional matters relating to Defendant's Motion to Compel.

2. On January 30, 2015, the Government produced to Defendants what was supposed to be its final Rule 16 discovery materials.

3. The parties are unable to file a status report regarding outstanding matters related to Defendant's Motion to Compel because the Government's production was incomplete. Defendants did not receive some of the production because the alleged victim companies require a protective order in advance of allowing the Government to produce documents. Defendants have not received a draft of a protective order.

4. The parties are also unable to file a status report regarding outstanding matters related to Defendant's Motion to Compel because the Government's production on January 30 was so voluminous. It will take several more days to assess what documents are on the disks produced by the Government.

5. The undersigned counsel has spoken with Jason Griess regarding this motion. Mr. Griess does not object to an extension of the February 10 deadline.

WHEREFORE, Defendant Mo Hailong prays this Court for an extension of the February 10, 2015 deadline to enter a status report regarding outstanding matters related to his Motion to Compel. He further prays that the parties may orally advise the Court on the status of these matters at the hearing on that part of Defendant's Motion to Compel that is fully briefed, currently set for February 26, 2015.

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ATTORNEYS FOR MO HAILONG, ALSO KNOWN AS ROBERT MO

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon the parties to this action by serving a copy upon each of the attorneys listed below on Feb. 10, 2015, by

☐ U.S. Mail ☐ FAX

☐ Hand Delivered ☐ Electronic Mail

☐ FedEx/ Overnight Carrier ☒ CM / ECF

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